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March 12, 2025

**Via ECF**

Hon. Edgardo Ramos  
United States District Court for the Southern  
District of New York  
40 Foley Square  
New York, New York 10007

**Re: *Smith et al. v. Scavino*, 1:24-mc-00566-ER (S.D.N.Y.)**

Dear Judge Ramos,

We write on behalf of Movants in the above-captioned matter to enforce a nonparty subpoena *duces tecum* (the “Subpoena”) to Respondent Daniel Scavino Jr. After Movants initiated this action, Mr. Scavino retained new counsel and agreed to produce documents responsive to the Subpoena. *See* ECF No. 13. Mr. Scavino produced those documents on February 19, 2025 and Movants are continuing negotiations. In light of this progress, Movants respectfully request that the Court adjourn the March 13, 2025 pre-motion conference until March 27, 2025.

Sincerely,



Joshua S. Margolin  
Partner

Cc: Jeremy Schulman; Jeffrey Gavenman